

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

TRUTEK CORP.,

Case No. 2:21-cv-10312

Plaintiff,

Hon. Stephen J. Murphy, III

v.

BLUEWILLOW BIOLOGICS, INC.,

Defendants.

PLAINTIFF’S MOTION TO AMEND THE SCHEDULING ORDER

NOW COMES Plaintiff TRUTEK CORP., by and through its attorneys, with this Motion to Amend the Scheduling Order, and hereby states the following:

1. The Complaint in this case was filed February 10, 2021.
2. The Court issued a Scheduling Order on November 3, 2021. (EFC 021).
3. The Parties have only recently begun discovery.
4. The Defendants served Plaintiff with 71 requests for production and 13 interrogatories, and has scheduled a 30(b)(6) Notice of Deposition for March 31, 2022.
5. Plaintiff’s co-counsel, Stanley Kremen, is currently out of the country.

EVENT	ORIGINAL DUE DATE	PROPOSED DUE DATE
WITNESS LIST DISCLOSURE DUE	3/20/22	5/4/22
EXPERT WITNESS DISCLOSURES	Opening Expert Reports: 5/16/22 Responsive Expert Reports: 7/1/22 Reply Expert Reports: 8/15/22	Opening Expert Reports: 6/30/22 Responsive Expert Reports: 8/15/22 Reply Expert Reports: 9/29/22
DISCOVERY ENDS	Fact: 4/1/22 Expert: 9/30/22	Fact: 5/16/22 Expert: 11/14/22
DISPOSITIVE MOTIONS DUE:	10/28/22	12/12/22

6. Plaintiff's co-counsel, Keith Altman, has recently become legally blind.

While accommodations are being put into place, it takes Mr. Altman considerably longer to read, write and prepare documents.

7. Plaintiff hereby requests the currently set discovery-related deadlines be extended by 45 days.

8. In accordance with Local Rule 7.1(2), Plaintiff met and conferred with the Defendant's counsel on the present motion but were unable to come to an agreement. Defendants wanted a settlement conference as a condition to agreeing to the extension. Unfortunately, discovery has just gotten underway and the case is not yet ripe for a settlement conference.

9. This request is not filed for the purpose of delay. It is Plaintiff's belief that no party will be prejudiced by the granting of this motion.

WHEREFORE Plaintiff respectfully requests that the Court approve the foregoing Motion to Amend the Scheduling Order dates as outlined above.

Dated: March 18, 2022

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Keith Altman', written over a horizontal line.

Keith Altman, Esq.
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Attorneys for Plaintiff

EXHIBIT A

**UNITED STATES DISTRICT COURT
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Plaintiff,

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v.

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Defendants.

AMENDED SCHEDULING ORDER

ORDERED that the Plaintiff's Motion to Amend the Scheduling Order is granted.

EVENT	ORIGINAL DUE DATE	AMENDED DUE DATE
WITNESS LIST DISCLOSURE DUE	3/20/22	5/4/22
EXPERT WITNESS DISCLOSURES	Opening Expert Reports: 5/16/22 Responsive Expert Reports: 7/1/22 Reply Expert Reports: 8/15/22	Opening Expert Reports: 6/30/22 Responsive Expert Reports: 8/15/22 Reply Expert Reports: 9/29/22
DISCOVERY ENDS	Fact: 4/1/22 Expert: 9/30/22	Fact: 5/16/22 Expert: 11/14/22
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March ____, 2022

BY THE COURT

Hon. Stephen J. Murphy, III

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CERTIFICATE OF SERVICE

I certify that on March 18, 2022, I served the foregoing Plaintiff's Motion to Amend the Scheduling Order upon all parties herein by filing copies of same using the ECF System.



Keith Altman, Esq.
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